



August 24, 2022

**VIA ELECTRONIC MAIL**

Jack L. Newhouse, Esq.  
Michele A. Moreno, Esq.  
Virginia & Ambinder, LLP  
40 Broad Street, 7th Floor  
New York, New York 10004

**Re: Defendant PDN's Courtesy Letter Regarding Summary Judgment  
*Bayne, et al. v. NAPW, Inc. et al.*, Case No. 18-cv-3591 (MKB)(RER)**

Dear Counsel,

Our firm represents Defendant Professional Diversity Network, Inc. d/b/a National Association of Professional Women and d/b/a International Association of Woman ("PDN") in the above referenced wage and hour litigation. Enclosed is Defendant PDN's Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56, including:

- 1) Notice of Defendant PDN's Motion for Summary Judgment;
- 2) Exhibits A – S annexed thereto;
- 3) Defendant PDN's R. 56.1 Statement of Material Facts;
- 4) Defendant PDN's R. 56.1 Memorandum of Law in Support of Defendant PDN's Motion for Summary Judgment; and
- 5) Certificate of Service.

Defendant will file these motion papers in accordance with the Court Ordered briefing schedule and the Judge's individual rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Wilson III".

Johner T. Wilson III  
Thaddeus A. Harrell  
*Attorneys for Defendant  
Professional Diversity Network, Inc.*